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Employment and Litigation Attorneys

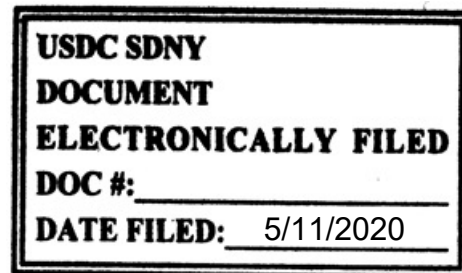
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May 11, 2020

**VIA ECF**

Hon. Robert W. Lehrburger  
United States Magistrate Judge  
United States District Court  
40 Foley Square  
New York, New York 10007



Re: Galindo Garcia v. John Doe Corp. d/b/a Italian Pizza Great Burrito, et al.;  
Case No. 18-cv-06165-ALC-RWL

Dear Judge Lehrburger:

The parties jointly write to request *nunc pro tunc* a forty-five (45) day extension of the close of discovery. The previous discovery deadline was April 20, 2020. This is the third such request and all previous requests were granted. We request this further extension as the ongoing Covid-19 crisis has made the contemplated in-person depositions impossible for the foreseeable future and, due to the need for translators, impracticable to conduct remotely.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

/s \_\_\_\_\_  
Clela A. Errington, Esq.  
Michael Faillace & Associates  
Counsel for Plaintiff

/s \_\_\_\_\_  
Anthony Portesy  
Hamra Law Group  
Counsel for Defendants

Extension granted. No further extensions absent compelling circumstances. Notwithstanding the need for interpreters, remote depositions can and, absent good cause, should be conducted.

SO ORDERED:

5/11/2020

A handwritten signature in black ink, appearing to be "R. Lehrburger", written over a horizontal line.

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE